

**EPA Region 7 File Review Report**  
Report Date: December 8, 2009

**Facility:** Titan Wheel Corporation of Iowa  
AKA: First Company Inc.  
455 S. Bluegrass Road  
Walcott, IA 52773  
EPA ID No. IAT20001099

**Introduction**

On December 4, 2009, SES, Inc. (SES) conducted a file review of the Titan Wheel Corporation of Iowa (Titan) facility located 455 S. Bluegrass Road, Walcott, Iowa. SES reviewed all documents included in the Region 7 United States Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) file. According to the September 1, 1987 Metcalf and Eddy, Inc. (M&E) Land Disposal Restriction (LDR) inspection, Titan rolled rims, hubs and wheels for the agricultural and automotive industry. Operations included metal fabricating, welding and painting.

This report includes a site history identifying site contamination and the resolution or non-resolution of those issues, as documented within the provided EPA files for this facility. This report also includes recommendations as to whether further actions may be required to further define site contamination.

Figure 1 shows a recent aerial photo of the site vicinity, which is approximately 250,000 square feet.

**Site History**

Titan first notified as a generator of hazardous waste on December 22, 1980 under the name French and Hecht. On August 27, 1985, a Compliance Evaluation Inspection (CEI) was conducted. The CEI noted that the facility was mixing hazardous lead-based paint with nonhazardous paint booth cleaning waste to render the entire mixture as nonhazardous so it could be disposed in the local landfill. The treatment of hazardous waste was occurring without a permit.

A Request for Information letter was sent to the facility from EPA on November 9, 1987, inquiring about the facility's waste streams and how the waste streams are managed. The facility responded stating that they have ceased mixing operations after the August 27, 1985 CEI. The facility began to separate the hazardous waste from the nonhazardous waste and send the hazardous waste to a permitted facility in Kentucky for disposal.

On September 17, 1998, a Complaint, Compliance Order and Notice of Opportunity for Hearing (CCO) was issued for storage of hazardous waste without a permit on eight

